

Lindsay Lien Amin (admitted PHV)  
Nicolet Law Office, S.C.  
517 2<sup>nd</sup> Street, Suite 205  
Hudson, WI 54016  
Tel: 715-245-2415  
lindsay@nicoletlaw.com

Eric R. Gruber, SBN 262602  
3626 Fair Oaks Blvd., Suite 100  
Sacramento, CA 95864  
Tel: 415-868-5297  
Fax: 415-325-5905

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT**

**EASTERN DISTRICT OF CALIFORNIA**

MATTHEW PETERSON, SADIE FLODING,  
COLIN STRUB, JODY BARRY, TEISCHA  
BENSON, LYNNETTA KLAM, and LORI  
DAVIES,

Plaintiff(s),

v.

THOMSON INTERNATIONAL,  
INCORPORATED, a California corporation;  
DOES 1-10, INCLUSIVE; and ROE  
ENTITIES 1-10, INCLUSIVE,

Defendant(s).

Case No.: 1:22-cv-00701 JLT-BAK (SKO)

**DECLARATION OF LINDSAY LIEN  
AMIN IN SUPPORT OF PLAINTIFFS'  
RESPONSE TO DEFENDANT'S MOTION  
TO DISMISS**

I, Lindsay Lien Amin, declare as follows:

1. I represent the Plaintiffs in the above-referenced matter.

2. Defendant filed a declaration containing plaintiffs' dates of birth and Plaintiff Jody Barry's complete social security number.
3. When asked for a remedy, Defendant withdrew the declaration but did not respond whether they would be willing to pay for credit monitoring for Ms. Barry, as has been ordered by other federal courts.
4. The undersigned has frequently recovered settlements for food poisoning victims that are several times the value of a claimant's medical expenses, as medical expenses are only one part of a claim.
5. Attached hereto as Exhibit 1 is a true and correct copy of the report of Dr. Theodoros Kelesidis.
6. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of the deposition of Jody Barry taken December 21, 2023.
7. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the deposition of Teisha Benson taken January 10, 2023.
8. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of the deposition of Lori Davies taken January 11, 2024.
9. Attached hereto as Exhibit 5 is a true and correct copy of excerpts of the deposition of Sadie Floding taken January 17, 2024.
10. Attached hereto as Exhibit 6 is a true and correct copy of excerpts of the deposition of Lynnetta Klam taken January 19, 2024.
11. Attached hereto as Exhibit 7 is a true and correct copy of excerpts of the deposition of Matthew Peterson taken January 23, 2024.
12. Attached hereto as Exhibit 8 is a true and correct copy of excerpts of the deposition of Colin Strub taken January 9, 2024.
13. Attached hereto as Exhibit 9 is a true and correct copy of the report of Dr. Scott Choi.
14. Attached hereto as Exhibit 10 is a true and correct copy of the Order Denying Def.'s Mtn. to Dismiss, *Angelo, et al., v. Thomson Int'l, Inc.*, 1:21-cv-01609-JLT-CDB, (U.S.D.C., E.D. Cal., Apr. 24, 2024.)

1 I declare under penalty of perjury under the laws of the State of Wisconsin that the  
2 foregoing is true and correct.

3 Executed on November 18, 2024, in Hudson, Wisconsin.

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